

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RISHI SHAH, et al.,

Defendants.

Case No. 19 CR 864

Judge Thomas M. Durkin

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**DEFENDANT RISHI SHAH'S UNOPPOSED MOTION  
FOR EXPEDITED BRIEFING SCHEDULE AND DECISION**

COMES NOW Defendant Rishi Shah, by and through undersigned counsel, and respectfully requests that this Court enter a prompt ruling on his Motion to Modify Conditions of Release (the "Motion") upon receipt of the Government's response in opposition, which it has agreed to file on or before Friday, May 30, 2025. In support of this request, Mr. Shah states as follows:

1. On May 27, 2025, Mr. Shah filed his Motion and a memorandum in support of the same.
2. Mr. Shah filed the Motion requesting a modification of his conditions of release for the purposes of attending a Young Professional Organization ("YPO") forum in Iceland.
3. Should the Court grant Mr. Shah's Motion, Mr. Shah will travel to Iceland in the company of his friend, Justin Ishbia, who will provide for Mr. Shah's travel to and from Iceland.
4. The YPO forum is set to take place between June 4, 2025, and June 6, 2025.
5. Given the proximity in time of the forum to the filing of the Motion, an expedited decision is required in order to prevent the Motion from becoming moot.

6. Prior to the filing of this request, the undersigned conferred with AUSA Jason Yonan, who agreed that the Government would file its response in opposition on or before May 30, 2025 in order to permit the Court to rule promptly on the Motion.

WHEREFORE Mr. Shah respectfully requests that this Court order give his motion expedited consideration so that Mr. Shah can travel as requested, should the Court grant his Motion.

Dated: May 27, 2025

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

/s/ Richard E. Finneran

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### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served upon all counsel of record by operation of the Court's electronic filing system.

/s/ Richard E. Finneran

RICHARD E. FINNERAN